

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

MATTHEW QUEEN,

Defendant.

Case No. 24 Cr. 291 (LAK)

[PROPOSED] ORDER UNDER FEDERAL RULE OF EVIDENCE 502(d)

After considering Defendant Matthew Queen (“Queen”) and non-party Southwestern Baptist Theological Seminary’s (the “Seminary”) Joint Motion for Entry of Agreed Order Under Federal Rule of Evidence 502(d), the Court hereby **GRANTS** the motion.

IT IS THEREBY ORDERED that the Seminary may disclose to Queen the identified privileged materials, Bates stamped P-SWBTS_000025-26 (redacted), P-SWBTS_000027-28, and P-SWBTS_000031, without a waiver or forfeiture of any claim of attorney-client privilege or work product protection in any federal or state judicial and/or administrative proceeding that the Seminary would otherwise be entitled to assert with respect to: (i) the documents; (ii) other documents relating to the subject matter of the documents; and/or (iii) other documents relating to the persons who sent or received or are named in the documents. The Seminary shall affix to all documents produced in connection with this Order the following legend: “CONFIDENTIAL MATERIAL SUBJECT TO FRE 502(d) ORDER.”

IT IS FURTHER ORDERED that counsel for Queen shall keep all documents and information produced by the Seminary in accordance with this Order within his exclusive possession and control. Queen and his counsel shall maintain the confidentiality of such documents and information and shall not permit the dissemination of such documents and information to any person or entity.

SO ORDERED.

Dated: _____, 2025.

Lewis A. Kaplan
UNITED STATES DISTRICT JUDGE